

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney
SARA WINSLOW (DCBN 457643)
Chief, Civil Division
ELIZABETH KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: 415-436-7298
elizabeth.kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

AKHILESH VANGALA, *et al.*,
Plaintiffs,
v.
UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,
Defendants.
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JOINT STATUS REPORT AND STIPULATION
TO CONTINUE THE STAY OF
PROCEEDINGS; [PROPOSED] ORDER
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Hon. Haywood S. Gilliam, Jr.
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The parties, through their undersigned attorneys, submit this joint status report regarding their continued settlement discussions. Plaintiffs have sent Defendants an initial draft settlement agreement. Defendants are in the process of reviewing the draft agreement and will forward soon a revised version to Plaintiffs. However, the parties need additional time to finalize the settlement agreement, and they anticipate that they can finalize the agreement within the next several weeks. Therefore, the parties respectfully request the Court to continue the stay of proceedings in this case for a limited time, until April 30, 2021. The additional time is necessary to allow the parties to finalize a settlement agreement that will render further litigation of this case unnecessary. Moreover, the parties are prepared to provide the Court with a status update at the case management conference scheduled for April 27, 2021. ECF 35.

Accordingly, the parties stipulate and request that the proceedings in this case be stayed until April 30, 2021. At that time, the parties may request a further continuance of the stay of proceedings, or

STIPULATION TO CONTINUE STAY OF PROCEEDINGS

1 court approval of a proposed settlement agreement and dismissal of the litigation if appropriate. A
2 continuation of the stay of proceedings in this case will benefit the parties and conserve the Court's
3 resources while the parties finalize a potential settlement.

4 DATED: April 19, 2021

Respectfully submitted,

5 STEPHANIE M. HINDS
6 Acting United States Attorney

7 s/ Elizabeth D. Kurlan
8 ELIZABETH D. KURLAN
9 Assistant United States Attorney

10 *Attorneys for Defendants*

11 DATED: April 19, 2021

12 s/ Matt Adams
13 MATT ADAMS
14 Attorney
15 Northwest Immigrant Rights Project

16 *Attorney for Plaintiffs*

17
18 **[PROPOSED] ORDER**

19 Pursuant to the stipulation of the parties, and good cause having been shown, it is hereby ordered
20 that the stay of proceedings in this case be continued until April 30, 2021.

21 IT IS SO ORDERED.

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23 DATED: _____

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HON. HAYWOOD S. GILLIAM, JR.
26 United States District Judge
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